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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS HOLDINGS, INC., et al., Debtors.	Chapter 11 Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS, INC., Plaintiff, - against- GUILD MORTGAGE COMPANY individually and as successor in interest to LIBERTY FINANCIAL GROUP, INC., Defendant.	Main Adv. Pro. No. 16-01019 Adv. Pro. No. 18-01866-SCC

**GUILD MORTGAGE COMPANY'S PRO-FORMA MOTION TO DISMISS FOR LACK
OF SUBJECT MATTER JURISDICTION AND IMPROPER VENUE**

Pursuant to the court's March 13, 2019 Amended Case Management Order [Doc. 825 Adv. No. 16-01019], at p.4, paragraph II(B), Defendant GUILD MORTGAGE COMPANY ("GUILD") hereby submits this *pro forma* Motion to Dismiss for Lack of Subject Matter Jurisdiction and Improper Venue in order to preserve its rights in this new adversary proceeding (Adv. Pro. No. 18-01866).

For the same reasons stated in GUILD's Omnibus Motion to Dismiss [Adv. No. 16-01019; Doc 413] and related pleadings and evidence, including those filed in Adv. No. 17-01001 [Doc Nos. 23, 24, 28, 29, 30, 31, 33], GUILD hereby requests that the court dismiss Adv. Pro. No. 18-01866 for lack of subject matter jurisdiction and for improper venue, or alternatively to transfer venue pursuant to FRCP 1404(a) to United States District Court in the District of Arizona, the State of Washington or Southern District of California.

Respectfully submitted,

LAW OFFICE OF EHRICH LENZ

Dated: May 13, 2019 By: _____

/s/ G. Ehrich Lenz

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CMF/ECF. I also certify that the foregoing document is being served this day via transmission of Notice of Electronic Filing generated by CM/ECF on all parties of record.

By: /s/ G. Ehrich Lenz
G. Ehrich Lenz